

FILED
U.S. DISTRICT COURT
DETROIT, MICHIGAN

2005 MAY 11 P 0 17

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U.S. DISTRICT COURT
DETROIT, MICHIGAN
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IN THE UNITED STATES DISTRICT COURT
NORTHERN DIVISION, DISTRICT OF UTAH

UNITED STATES OF AMERICA,)
Plaintiff,) DEFENDANT'S MEMORANDUM
v.) REGARDING RESTITUTION
TERRI MICHELE ANDERSON,)
Defendant.) Case No. 1:04-CR-084 PGC

Defendant, Terri Anderson ("Anderson"), by and through her counsel of record, Vanessa M. Ramos, hereby submits the following memorandum to the Court regarding restitution. Anderson recognizes that this Court must impose restitution in this case under 18 U.S.C. § 2259, which requires mandatory restitution in cases of this nature.

The estimates and proposals set forth in the Government's memorandum appear to be a reasonable assessment of potential future costs of counseling.¹ However, Anderson submits

¹There appears to be a typo in the Government's memorandum referring to the number of weeks of anticipated counseling for B.C., until the age of majority. The memorandum states 6107 weeks, but it should read 610 weeks.

that if counsel were to cease, or some other circumstance were to occur which altered the proposed schedule of weekly counseling sessions, she be allowed to petition the Court for a modification of any restitution order.

RESPECTFULLY SUBMITTED this 11th day of May, 2005.

UTAH FEDERAL DEFENDERS OFFICE

By Vanessa M. Ramos
VANESSA M. RAMOS
Assistant Federal Defender

CERTIFICATE OF SERVICE

I hereby declare that I mailed/delivered a true and correct copy of the foregoing Defendant's Memorandum Regarding Restitution, postage prepaid, this 14 day of May, 2005, to the following:

Paul G. Ammon, Esq.
Special Assistant United States Attorney
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Phyllis A. Walker